

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Honeywell International Inc.	AI #:	2082	TEMPO Activity No:	PER20090008
Facility Name:	Geismar Complex – HF Plant	Remarks Submitted by:	RTP Environmental Associates Inc.		
Permit Writer:	Kyle Prestenbach	Permit Writer Email address:	kyle.prestenbach@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – DO NOT COMPLETE THIS SECTION. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Air Permits Division Response (for official use only)
Statement of Basis Pg 13 of 16 Prevention of Significant Deterioration (PSD Review) section	<p>Since the facility calculated post-project emissions as <i>Potential-to-Emit (PTE)</i> emissions and not as <i>Projected Actual Emissions</i>, the paragraph as referenced regarding LAC 33:III.509.R.6 does not apply. However, for clarification purposes, the aforementioned paragraph was changed as follows:</p> <p>“The emissions of CO will increase by more than 50 percent of its significance level. However, since the facility calculated post-project emissions by using the project’s <i>Potential to Emit</i> (as defined in LAC 33:III.509.B) instead of using the project’s <i>Projected Actual Emissions</i> (as defined in LAC 33:III.509.B), there is no reasonable possibility that the project will result in a significant emissions increase. Therefore, pre-project and post-project monitoring, recordkeeping, and reporting requirements pursuant to LAC 33:III.509.R.6 are not required.”</p>

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet Pg 4 Prevention of Significant Deterioration (PSD) Review section	<p>The last paragraph indicates that Honeywell will be required to conduct pre-project and post-project monitoring, recordkeeping, and reporting as specified under LAC 33:III.509.R.6 since the proposed carbon monoxide increase associated with the installation of a new boiler is greater than 50% of the PSD significance level. LAC 33:III.509.R.6 is applicable to projects where the owner/operator elects to use the method in LAC 33:III.509.B. <i>Projected Actual Emissions</i> a-c. As the emission rate requested is calculated as Potential-to-Emit and not Projected Actual Emissions, the pre-project and post-project monitoring, recordkeeping, and reporting is not required. Remove this requirement and associated paragraph from this section.</p>	<p>"The emissions of CO will increase by more than 50 percent of its significance level. However, since the facility calculated post-project emissions by using the project's <i>Potential to Emit</i> (as defined in LAC 33:III.509.B) instead of using the project's <i>Projected Actual Emissions</i> (as defined in LAC 33:III.509.B), there is no reasonable possibility that the project will result in a significant emissions increase. Therefore, pre-project and post-project monitoring, recordkeeping, and reporting requirements pursuant to LAC 33:III.509.R.6 are not required."</p>
Air Permit Briefing Sheet Pg 13 X. Table I. Applicable Louisiana and Federal Air Quality Requirements EQT0126	<p>This source will emit toxics. Applicability is identical to EQT0054. Include a "3" under 2103 and a "1" under 51*.</p>	<p>Updated permit as requested.</p>
Air Permit Briefing Sheet Pg. 13 X. Table I. Applicable Louisiana and Federal Air Quality Requirements EQT0128	<p>This source will emit toxics. Include a "3" under 2103 and a "1" under 51*.</p>	<p>Updated permit as requested.</p>
Specific Requirements Page 18 of 28	<p>EQT0128 (10-09 – Tank U-821) is not shown. The source emits trace quantities of sulfuric acid (Class III TAP) and arsenic compounds (Class I TAP). As described in the permit application, emissions of arsenic compounds are so low that it is not technically feasible to control these emissions. Include a specific requirement indicating the applicability of LAC:33.III.Chapter 51 and indicate that MACT is determined as no control, as is provided for other sources in the permit with extremely small arsenic compound emissions.</p>	<p>Added the following MACT requirement for consistency with other similar sources:</p> <p>"Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Emits a Class I TAP. No control is determined to be MACT. [LAC 33:III.5109.A.1]"</p>
Specific Requirements Pg. 26 of 28 Requirement Nos. 284-286	<p>Remove these requirements associated with the conduct of pre-project and post-project monitoring, recordkeeping, and reporting as specified under LAC 33:III.509.R.6, as described above.</p>	<p>Removed requirements as requested since they do not apply (see response above).</p>

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Permit Writer:	Kyle Prestenbach	Permit Writer Email address:	Kyle.Prestenbach@LA.gov		

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
2394-V1	Title V permit Mod. to HF plant. No Technical comments. The CO emissions under PSD review (Table 2) and the Estimated emissions after Mod. do not match. I may be missing something.	The difference is that the unit-wide estimated permitted rate for CO takes into account the shutdown of the current boiler which has a CO emission rate of 18.04 TPY (64.04 TPY (new boiler) – 18.04 TPY (old boiler) = 46 TPY CO increase) whereas the PSD analysis does not take this into account and only looks at project increases (+ 64.04 TPY CO (new boiler)).